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Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

REC'D IN
REGULATORY AUTH.
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OFFICE OF THE
EXECUTIVE SECRETARY

Re: Rulemaking Proceeding Concerning Regulations for the Provisioning of
Tariff Term Plans and Special Contracts
Docket No. 00-00702

Dear Mr. Waddell:

Enclosed please find the original and thirteen (13) copies of Time Warner Telecom of the Mid-South's, L.P.'s Petition for Reconsideration in the above-referenced docket. If you have any questions, please contact me.

Very truly yours,

FARRIS, MATHEWS, BRANAN,
BOBANGO & HELLEN, P.L.C.

Charles B. Welch, Jr. /lw

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CBW:lw

Enclosure

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

**RULEMAKING PROCEEDING CONCERNING
REGULATIONS FOR THE PROVISIONING OF
TARIFF TERM PLANS AND SPECIAL
CONTRACTS**

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Docket No. 00-00702

PETITION FOR RECONSIDERATION

Time Warner Telecom of the Mid-South, L.P. ("Time Warner") files this Motion for Reconsideration of the Directors' action in adopting the rules in this proceeding at the Directors' Conference on Tuesday, April 3, 2001, and in support of this petition, would state as follows:

1. Current Tennessee Regulatory Authority ("TRA") rules governing the provisions of special contracts of competing local telecommunication service providers permit contract service arrangements or special contracts to become effective upon their execution by the customer and the provider, as do most all contracts between competent parties. Further, these rules require competing local telecommunication service providers to merely file a brief summary of the contract provisions including a description of the services provided. Rule 1220-4-8-.07(3). Summaries filed with the TRA by competing providers do not require disclosure of competitively sensitive information. Time Warner has been providing special contracts to its customers pursuant to the terms of these rules for approximately two years.

2. The rules that have been adopted by the TRA to replace the rules currently in effect require the filing of the special contracts or a detailed summary with the TRA at least ten days before the effective date of the agreement delaying the implementation of

the contract. Additionally, the contract themselves or the more detailed summary now required necessarily discloses extremely competitively sensitive information which is available for public inspection.

3. Time Warner submits that the new rules are unnecessary and excessively onerous in that implementation of these rules increase its administrative costs, serve as a barrier to the development of competition, provide an information source to its competitors which represent a competitive disadvantage and delay the benefits of competition to consumers.

4. Time Warner submits that the TRA should reconsider its action of April 3, 2001, and consider adopting a rule applicable to competing local telecommunication service providers which would be no more onerous than the rule under which the parties have been operating since June 15, 1998. In support of this specific request, Time Warner contends that the local exchange markets in which it competes are becoming more competitive and less regulation should be required as these markets become more competitive. Further, Time Warner submits that its customers pursuant to special contracts are sophisticated business customers quite capable of analyzing contract provisions before agreeing to become obligated and that these customers often require provisioning of services within two to three days as a condition to choosing Time Warner as its local provider.

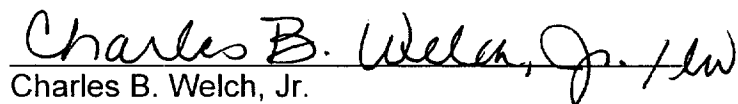
5. Time Warner concludes that the TRA should not allow the new rules to become effective as they are applicable to competing local exchange telecommunications service providers and that these rules will significantly impair those providers' ability to compete.

WHEREFORE, petitioner, Time Warner Telecom of the Mid-South, L.P., requests that the Tennessee Regulatory Authority reconsider its order adopting the rules in this docket on April 3, 2001, and consider adopting a substitute rule applicable to competing local telecommunication service providers special contracts which is not unduly burdensome, and will encourage the orderly development of a competitive market.

At a minimum, Time Warner specifically requests that the TRA allow the contracts entered into by competing local telecommunications service providers and their customers to become effective upon execution, and, that if there is to be filing requirement, that all competitively sensitive information be allowed to be filed under proprietary seal.

Respectfully submitted,

FARRIS, MATHEWS, BRANAN,
BOBANGO & HELLEN, P.L.C.


Charles B. Welch, Jr.
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South, L.P.
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served via U.S. Mail, postage prepaid, upon the following, this the 12th day of April, 2001.

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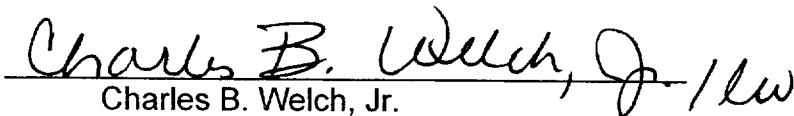
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